

NOV 08 2010

Water Docket
Environmental Protection Agency
Mail Code: 2821T
1200 Pennsylvania Ave., NW.
Washington, D.C. 20460

RE: Written comments for **Docket ID #:** EPA-R03-OW-2010-0736; the Chesapeake Bay TMDL

I am a farmer in Rockingham County, Virginia. I am also a member of the Mennonite faith. I'm concerned that several issues being discussed will affect my lifestyle and potentially my ability to farm. Please understand I choose not to participate in the legislative process or government programs for my personal financial benefit in accordance with my religious beliefs. That said I sincerely hope the following information will be considered when developing and implementing both the TMDL and the Watershed Improvement Plan for the State of Virginia.

First: Many of us have voluntarily implemented numerous Best Management Practices on our farms with no financial help from government agencies. No-till farming, fencing livestock out streams, nutrient management plan based fertilization, building manure management structures and riparian buffers are a few specific examples. We sincerely hope the plan will consider all of the practices we already have in place. We are willing to make additional improvements that are financially feasible.

Second: Many of the practices and requirements being discussed will be very costly to implement. High cost regulations without offsetting economic returns will place an extremely heavy burden on our farms and families – especially for those of us who don't accept government cost share. We hope required cures will be cost effective and have an implementation window long enough to allow them to be repaid with earnings.

Third: Nutrient reduction has been achieved through the voluntary practices we've already put in place. Many of the nutrient loading levels being discussed are based on research that is not yet proven. The models need to accurately reflect nutrient use from field crops. Average yields used in models are out of date with current yields generated on our farms. We hope any new regulatory burdens will be based on sound science with accurate yield models. We also need time to allow each incremental improvement to be evaluated. *one example - go to bottom*

Fourth: Proposed practices will place significant economic burden on agribusinesses – especially poultry integrators. These businesses could easily shift to other areas of the country with less stringent and less costly environmental requirements. Our family farms may lose income generating opportunities and no longer be viable if a shift like this occurs.

NOV 04 2010

is a situation where a farmer cleared some virgin land, never had nutrients applied, and the phos. levels were higher than what you'll want to set the benchmark for agriculture land.

Fifth: We have demonstrated our ability to work with state and local agencies to improve water quality. Many of our farms already have permits from various state agencies. We hope control of the plan and all regulations will be managed at the state level.

Sixth: Adding costly regulations without economic benefit may make young and beginning farmers unable to enter agriculture. The average age of farmers in the Chesapeake Bay watershed is increasing. Young and beginning farmers already face significant financial and environmental challenges which make farming difficult. Proposed regulations without offsetting financial benefit will only make this worse.

I appreciate the chance to comment on the proposed regulation. The environment is important to me and my family. We have worked hard to improve water quality in the Chesapeake Bay watershed. We hope all proposed regulations will be fair without putting our region, businesses and lifestyles at an economic disadvantage to other regions.

Sincerely,

Nalyn E. Eberly

One thing that is a concern to me is the fact that we as a nation are getting more and more dependent on foreign countries, it appears too the plan that is being considered will not be cost effective, nor is it going to achieve the goals you all expect, then what? the farmer can not stay in business...so we'll just get our food from other countries that will not have the quality standards America ask from their own farmers, and by the way, the terrorists would like to start feeding our nation.

It seems like the farmer's have to keep doing more and more so Merck and the Sewer Treatment plants ect. can keep dumping their loads in, It seems like where ever the most money is that is who possibly gets off easier, but just don't forget where our food comes from.